

### **REMARKS**

Claims 12-22 are pending in this application, of which claims 16 and 20 have been amended. No new claims have been added.

The Examiner has maintained from the previous Office Action the 35 U.S.C. §102(b) rejection of claims 16 and 20 as anticipated by **McQuade et al.**

Applicants respectfully traverse this rejection.

In Applicants' last response it was argued:

The Examiner fails to identify the to-be-contacted member, and FIG. 2 showing "Prior Art" shows the only element which could be identified as such, which is integrated circuit 14 having pads 14a. Page 5, line 18 discloses that the coefficient of thermal expansion (CTE) of the silicon wafer (the integrated circuit,) is  $2.8 \times 10^{-6} \text{m/m/}^{\circ}\text{K}$ , while the CTE of dielectric sheets 56, 58 (corresponding to the holder hole forming unit set of the instant application) is  $3.4 \times 10^{-6} \text{m/m/}^{\circ}\text{K}$  and the CTE of the spacer members 74, 76 (corresponding to the supporting member of the instant application) is not disclosed. Therefore, **McQuade et al.** fails to disclose that "any one of the supporting member and the holder hole forming unit has a coefficient of linear expansion higher than that of the to-be-contacted member, while the other has a coefficient of linear expansion lower than that of the to-be-contacted member, as recited in claim 16 of the instant application.

The Examiner now urges that the CTE of the to-be-contacted member is not disclosed and can therefore be disregarded in the claim language, but he urges that because the material and geometrical characteristics of the supporting member (laminated layers 74, 76) and the holder forming unit (56) are different, they must also have different CTE.

Without commenting on this argument, Applicants note that item 56 is merely a dielectric sheet covering one end of aperture 52. This is in contrast to the present invention, in which the holder hole forming unit is formed of a material that fills the opening (aperture) or surrounds the contacts and includes a holder hole accommodating an electrically conductive contact.

Accordingly, claims 16 and 20 have been amended to recite these distinctions, and the 35 U.S.C. §102(a) rejection should be withdrawn.

The Examiner has maintained from the previous Office Action the 35 U.S.C. §102(b) rejection of claims 12-14, 18, 21 and 22 as anticipated by **Kazama ('572)**.

Applicants respectfully traverse this rejection.

In Applicants' last response it was noted:

No CTE differences are disclosed for thin plate members 10a to 10f, and **Kazama**, therefore, fails to disclose adjacent supporting frames having higher and lower CTE's, respectively, than the to-be-contacted members, as recited in claims 12 and 18 of the instant application.

Regarding claims 21-22, the Examiner urges that element 9 corresponds to the holder hole forming unit set 9 of the instant application.

Applicant respectfully disagrees. Element 9 is merely an insulating film formed on the inner circumferential surface of holder hole 4, and is formed using one of various kinds of deposition methods. Therefore, the insulating film cannot be considered to be substantial enough to form holder holes within it, as recited in claim 21.

The Examiner has now urged:

However, it is clear that the upper layer 10a having a bonding agent on one side has a different thermal characteristics than that of layer 10b having a bonding agent on both sides. On the other hand, the thermal characteristics of the corresponding layers are compared with that of a to-be contacted member which is not explicitly claimed as not being a part of the holder. Since requirements to and CTE of the to-be contacted member are not disclosed, quantitative thermal characteristic of an unspecified to-be contacted member would be between the respective characteristics of the holder's components.

Applicants respectfully disagree. Because the cross-hatching style is identical for layers 10a-10f, it should be assumed that they have identical construction and therefore identical (just different directions) CTE.

Thus, the 35 U.S.C. §102(b) rejection should be withdrawn.

The Examiner has maintained from the previous Office Action the 35 U.S.C. §102(b) rejection of claims 12 and 14 as anticipated by Kazama (**JP '513**).

Applicants respectfully traverse this rejection.

As noted in Applicants' previous response:

**JP '513** discloses a conductive needle-like body 3 and a coil spring 4 provided in a holder hole 2 made in a support body 1. A pin 9 is protruded from a circuit board 5 having a terminal 5a in contact with the coil spring 4, the support body 1 is held in a displaceable manner by a through-hole 10 made in the support body and the pin, and the conductive needle-like body is brought into contact with an electrode 6a of a wafer 6 for inspection. Both members can be positioned without being integrated with each other by adhesive or the like, and can be easily separated during the maintenance, and a conductive contact can be easily exchanged, and a plate-like body can be easily repaired.

**JP '513** is in Japanese and the English Abstract provided fails to disclose anything about coefficients of thermal expansion, as recited in claims 12, 14-18 and 20 of the instant application.

Like **Kazama ('572)** discussed above, the cross hatching style of elements 1a and 1b are identical (just different directions) so it should be assumed that they also have identical CTE.

Thus, the 35 U.S.C. §102(b) rejection should be withdrawn.

The Examiner has also maintained from the previous Office Action the 35 U.S.C. §103(a) rejection of claims 13, 19 as unpatentable over **Kazama '513** in view of Japanese Document 8-5664 (hereinafter **JP '664**).

Applicants respectfully traverse this rejection.

**JP '664** discloses an inspection bond for products of a semiconductor device which employs invar and copper for main structural member in order to match the coefficient of thermal expansion with an IC wafer and a protrusion 2, serving as a terminal for allowing contact with an object to be inspected, is provided on the surface circuit 5. The production method comprises a step for laminating a three layer metal foil

6 of copper layer 63 for circuit/intermediate layer 62 of nickel or nickel alloy/cooper layer 61 for providing a protrusion, an insulating material responsible for adhesion, and a clad plate 8 composed copper layer 81/invar layer 82/cooper layer 81 by hot press such that the copper layer 63 for circuit and the clad plate 8 touches the insulating material 7.

Neither of the references teaches, mentions or suggests comparing CTE's of the supporting frame layer with that of the to-be-contacted member, as recited in claims 12 and 18, from which claims 13 and 19 respectively depend.

Thus, the 35 U.S.C. §103(a) rejection should be withdrawn.

In view of the aforementioned amendments and accompanying remarks, claims 12-22, as amended, are in condition for allowance, which action, at an early date, is requested.

Dated: June 12, 2009

**CUSTOMER NO.: 21874**

Respectfully submitted,

By 

William L. Brooks

Registration No.: 34,129

EDWARDS ANGELL PALMER & DODGE  
LLP

P.O. Box 55874

Boston, Massachusetts 02205

(202) 478-7376

Attorneys/Agents For Applicant